

September 6, 2011

*via hand delivery*

Cynthia T. Brown  
Chief, Section of Administration  
Office of Proceedings  
Surface Transportation Board  
395 E Street, SW  
Washington, D.C. 20423

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**RE: Docket No. NOR 42121, TOTAL Petrochemicals USA, Inc. v. CSX  
Transportation, Inc.**

Dear Ms. Brown:

Enclosed for filing in the above-captioned case please find an original and ten (10) copies of the Errata to Rebuttal Market Dominance Evidence ("Errata") of TOTAL Petrochemicals USA, Inc. ("TPI").

I have enclosed one additional paper copy for stamp and return. Kindly date-stamp the additional copy for return to this office by messenger.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,



David E. Benz  
*Counsel for TOTAL Petrochemicals USA, Inc.*

Enclosure

cc: Counsel for defendant CSX Transportation, Inc.

**BEFORE THE  
SURFACE TRANSPORTATION BOARD**

\_\_\_\_\_  
TOTAL PETROCHEMICALS USA, INC. )

Complainant, )

v. )

CSX TRANSPORTATION, INC. )

Defendant. )  
\_\_\_\_\_

Docket No. NOR 42121

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**ERRATA TO REBUTTAL MARKET DOMINANCE EVIDENCE**

TOTAL Petrochemicals USA, Inc. ("TPI") hereby files this Errata to Rebuttal Market Dominance Evidence ("Errata"). TPI filed its Rebuttal Market Dominance Evidence on this same day, September 6, 2011, but inadvertently omitted the Statement of Qualifications and the Verification page for witness Robert W. Granatelli. TPI respectfully requests that the Surface Transportation Board ("Board" or "STB") accept the attached Statement of Qualifications and Verification page.

Respectfully submitted,



\_\_\_\_\_  
Jeffrey O. Moreno  
David E. Benz  
Thompson Hine LLP  
1920 N Street, N.W., Suite 800  
Washington, D.C. 20036  
(202) 331-8800

September 6, 2011

**CERTIFICATE OF SERVICE**

I hereby certify that this 6th day of September 2011, I served a copy of the foregoing upon counsel for defendant CSXT via hand-delivery at the address below:

G. Paul Moates  
Paul Hemmersbaugh  
Sidley Austin LLP  
1501 K Street, NW  
Washington, DC 20005

*Counsel for CSX Transportation, Inc.*

*Jeff Moreno - by David Benz*  
\_\_\_\_\_  
Jeffrey O. Moreno

**ROBERT W. GRANATELLI**

Transportation Consultant

Mr. Granatelli is sponsoring factual evidence pertaining to the polymers industry and supply chain practices used in the industry, as well as the reasons for use of those practices. In particular, Mr. Granatelli responds to Reply Evidence arguments made by CSX Transportation, Inc. ("CSXT") regarding the various storage and transportation methods used for polymers such as polypropylene, polyethylene, and polystyrene by manufacturers of polymers, transportation providers, and consumers of polymers. Mr. Granatelli provides an evaluation of the operations of TOTAL PETROCHEMICALS USA, INC. ("TPI") in light of assertions made by CSXT in its Reply Evidence. He also analyzes the various transportation and supply chain alternatives that CSXT claims can or should be used by TPI.

Mr. Granatelli is an independent transportation consultant with an address of 401 SW 4<sup>th</sup> Avenue, Apt 1503, Ft Lauderdale, FL 33315. Mr. Granatelli has 32 years of experience in all modes of domestic and international transportation and logistics, a large portion of which was spent working for Basell on plastics supply chain issues. He directed Basell's transportation for almost 20 years before retiring in 2008. In addition, Mr. Granatelli was manager of rail procurement for International Paper. During his Basell tenure, Mr. Granatelli was responsible for the operational management and economics of all modes of deliveries. This entailed operation of over 5,000 plastics hopper cars delivering over 20,000 rail shipments of polymer products annually, as well as establishment and operation of plastic intermodal transload facilities throughout the U.S. and Canada. Basell held contracts with all U.S. and Canadian Class I railroads, and with the largest U.S. and Canadian bulk motor carriers of plastics, to accomplish this transportation. Mr. Granatelli has made presentations regarding logistics business issues to

members of Congress, and before industry groups, including the National Industrial Transportation League, The Intermodal Association of North America, The Council of Logistics Management, and The American Chemistry Council. He is a former director of the American Plastics Council-Committee and Transportation and Distribution, Chairman of the Railroad Sub-Committee of the American Plastics Council-Committee and Transportation and Distribution, Board member of the National Industrial Transportation League, and Chairman of the National Industrial Transportation League Executive Rail Advisory Panel. Mr. Granatelli has been engaged in supply chain consulting since 2008.

**VERIFICATION**

I, Robert W. Granatelli, verify under penalty of perjury that I have read the Rebuttal Evidence of TOTAL PETROCHEMICALS USA, INC. in this proceeding that I have sponsored, as described in the foregoing Statement of Qualifications, that I know the contents thereof, and that the same are true and correct based on my knowledge, information, and belief. Further, I certify that I am qualified and authorized to file this statement.

  
Robert W. Granatelli

Executed on August 30, 2011